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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**IN RE:**

**REVOLVE SOLAR (TX) INC.,**

**Debtor.**

§  
§  
§  
§  
§

**CASE NO. 16-10897-tmd  
Chapter 11**

**MOTION TO CONVERT OR VOLUNTARILY DISMISS  
DEBTOR'S CHAPTER 11 BANKRUPTCY**

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**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO  
YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN 21 DAYS FROM THE  
DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE  
GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE  
HELD.**

**TO THE HONORABLE JUDGE OF THE BANKRUPTCY COURT**

COMES NOW, Revolve Solar (TX) Inc., ("Debtor"), Debtor in the above-captioned chapter 11 case, and requests that its Chapter 11 bankruptcy case be dismissed.

1. Debtor filed a voluntary petition for Chapter 11 bankruptcy relief on July 31, 2016 and is currently operating its business as a debtor-in-possession.

2. The Debtor-in-Possession has limited remaining operations that do not support a plan to reorganize. The Court should convert the case to Chapter 7 because the Debtor has creditors who would benefit from the sale of its remaining assets. The Debtor is simultaneously filing a Motion to Sell Assets Free and Clear of Liens, Claim and Encumbrances that would result in some funds being paid into the estate for distribution to creditors.

3. Under 11 U.S.C. §1112(b), "the Court shall convert a case under this chapter to a case under chapter 7 or dismiss a case under this chapter, whichever is in the best interests of creditors and the estate, for cause unless the court determines that the appointment under section 1104(a) of a trustee or an examiner is in the best interests of creditors and the estate." 11 U.S.C. §1112(b)(1).

4. Cause exists to dismiss the case or convert to chapter 7 due to cause under these subsections of 11 U.S.C. §1112(b)(4): (A) the continuing loss to or diminution of the estate and the absence of a reasonable likelihood of rehabilitation;

5. Debtor has become administratively insolvent and no longer has the ability to reorganize its debts.

6. Debtor requests that its Chapter 11 bankruptcy case be converted or dismissed, whichever the Court deems appropriate.

**WHEREFORE, PREMISES CONSIDERED,** Debtor prays for an order from the Court converting or dismissing Debtor's Chapter 11 bankruptcy proceeding and for such other and further relief to which it may show itself justly entitled.

Dated: March 24, 2017.

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 24, 2017, a true and correct copy of the foregoing document was forwarded via United States first class mail, postage prepaid, upon the parties on the attached service list.

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1500 Valley House Dr #210  
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PO Box 848345  
Dallas, TX 75284-8345

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Suite 202  
Boston, MA 02110-1311

Sunstate Equipment, Co  
P.O. Box 52581  
Phoenix, AZ 85072-2581

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REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION  
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Texas Workforce Commission  
Regulatory Integrity Division - SAU  
Room 556  
101 E. 15th Street  
Austin, TX 78778-0001

Texas Workforce Commission  
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Travis County Tax Office  
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Austin, TX 78714-9328

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Tugwell Roofing, Co  
20550 Dersch Rd  
Anderson, CA 96007-8462

UPS  
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Carol Stream, IL 60132-0577

(p)UNITED RENTALS NORTH AMERICA INC  
3200 HARBOR LN N  
MINNEAPOLIS MN 55447-5295

United Rentals, Inc.  
6125 Lakeview Road, #300  
Charlotte, NC 28269-2616

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Civil Process Clerk  
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San Antonio, TX 78216-5512

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Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, DC 20530-0009

United States Trustee  
903 San Jacinto, Room 230  
Austin, TX 78701-2450

United States Trustee - AU12  
United States Trustee  
903 San Jacinto Blvd, Suite 230  
Austin, TX 78701-2450

Vacaville Crossroads Church  
Attn: Rich Burke  
190 Butcher Road  
Vacaville, CA 95687-5615

Valero - Chico  
Attn: Parmijita Gosal  
1199 Skyway Road  
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Valley Church  
Attn: Linda May  
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Vacaville, CA 95687-9468

Valley Mountain Regional Center  
Attn: Claudia Reed  
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William Del Casale  
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William Pete Lipscomb  
2703 Dogama Ct  
Cedar Park, TX 78613-5716

World Telecom & Surveillance, Inc  
1819 Keystone Ct  
Redding, CA 96003-4000

Xerox Corporation  
P.O. Box 802555  
Chicago, IL 60680-2555

Yellow Pages  
P O Box 5010  
Carol Stream, IL 60197-5010

Yellow Pages United  
PO Box 53282  
Atlanta, GA 30355-1282

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Santa Rosa, CA 95404-4516

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

PG&E  
Non-Energy Collection Unit  
PO Box 8329  
Stockton, CA 95208

Texas Comptroller of Public Accounts  
Revenue Acctng Div - Bankruptcy Section  
PO Box 13528 Capitol Station  
Austin, TX 78711-3528

United Rentals (North America), Inc.  
PO Box 840514  
Dallas, TX 75284-0514

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Adriano Castillo

(d)Audrey Walker  
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Boerne, TX 78006-8809

(d)Audrey Walker  
34 J Williams Rd.  
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(d)Brian Washburn  
9285 Stanford Lane  
Durham, CA 95938-9502

(u)Crawford Electric Supply, Inc.  
c/o Misti L. Beanland  
Matthews, Shiels, Knott, LLC  
8131 LBJ Freeway, Suite 700, Dallas, TX  
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(d)Internal Revenue Service  
Centralized Insolvency Operations  
P.O. Box 7346  
Philadelphia, PA 19101-7346

(d)Mark Gross  
400 Reservation Drive  
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(d)Pete Lipscomb  
2703 Dogama Court  
Cedar Park, TX 78613-5716

End of Label Matrix  
Mailable recipients 302  
Bypassed recipients 8  
Total 310